IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

INFORMATION

v.

Case No. 1:22-cr-038

Violations: 18 U.S.C. §§ 2252(a)(4)(B),

2252(b)(2), and 2253(a)

SHAWN ROBINSON NELSON

Possession of Images Depicting the Sexual Exploitation of Children

From in or about October 2019 to in or about March 2021, in the District of North Dakota, and elsewhere,

SHAWN ROBINSON NELSON

knowingly possessed visual depictions using a means and facility of interstate and foreign commerce, to wit: the internet, which depictions had been transported in interstate and foreign commerce by any means, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATION

Upon conviction of violating Title 18, United States Code, Section 2252, as

charged in this Information,

SHAWN ROBINSON NELSON

agrees that he shall forfeit to the United States any and all matter which contains visual

depictions produced, transported, shipped, and received in violation thereof and any and

all property used and intended to be used in any manner and part to commit and to

promote the commission of such violations, including, but not limited to, the following:

• One Dell Latitude 3480 Laptop Computer; and

• One Amazon Kindle, Model Number D01200.

By virtue of commission of one or more of the felony offenses as charged in this

Indictment, all right, title, and interest in the above-described property is vested in the

United States and is hereby forfeited to the United States, pursuant to Title 18, United

States Code, Section 2253(a).

for

MAC SCHNEIDER

United States Attorney

GLD/tmg